

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

PATRICK HALEY, et al.,

Plaintiffs,

v.

AMS SERVICING, LLC, et al.,

Defendants.

Civil Action No. 2:13-cv-05645-FSH-JBC

**NOTICE OF DEFENDANTS' MOTION TO
DROP PLAINTIFFS AND TO DISMISS
PLAINTIFFS' COMPLAINT**

TO: R. Geoffrey Broderick, Esq.
The Resolution Law Group, P.C.
500 West Putnam Avenue, Ste. 400
Greenwich, CT 06830

PLEASE TAKE NOTICE THAT on November 4, 2013, at 9:00 a.m., or as soon thereafter as counsel may be heard, counsel for Defendants Bank of America, N.A. and Countrywide Home Loans, Inc. ("Defendants") shall move before the Honorable Faith S. Hochberg, U.S.D.J., at the Federal District Court for the District of New Jersey located at the Martin Luther King, Jr. Federal Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07101, on a Motion to Drop Plaintiffs and to Dismiss Plaintiffs' Complaint with prejudice.

PLEASE TAKE FURTHER NOTICE that in support of this Motion, Defendants shall rely on their Memorandum of Law and Certification of Scott H. Kaiser, Esquire, submitted herewith.

PLEASE TAKE FURTHER NOTICE that Defendants respectfully request oral argument if this Motion is opposed.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order granting Defendants' Motion to Drop Plaintiff and to Dismiss Plaintiffs' Complaint with prejudice is enclosed herewith.

BRYAN CAVE LLP

By: /s/ Scott H. Kaiser
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Dated: October 10, 2013

REED SMITH LLP

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Dated: October 10, 2013